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The Senate Victory Fund

#21 1007 AM '96

Post Office Box 1531, Starkville, Mississippi 39215-1531

Thad Cochran
U.S. Senator
Honorary Chairman

Joseph B. Fenley
Chairman
B. Keith Hill, CPA
Treasurer

April 15, 1996

Ms. Neil Evans
Reports Analyst
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Dear Ms. Evans:

This letter is in response to your notice dated March 27, 1996 regarding our report covering the period 07/01/95 - 12/31/95.

With regard to your first item, we have researched the contributions in question and our results are as follows:

The contribution reported from NACS PAC has been clarified to be reported as from National Association of Chain Drug Stores (FEC #C0022368). A copy of the amended schedule is enclosed.

The contribution reported from Bell South Services Federal PAC has been clarified to be reported from BellSouth TeleCommunications Inc. Federal PAC (FEC # C00099655). A copy of the amended schedule is enclosed.

With regard to the second item, the disbursements are as follows:

Gordon Smith for U. S. Senate - \$1,000.00 to the Primary Election (Primary Debt)

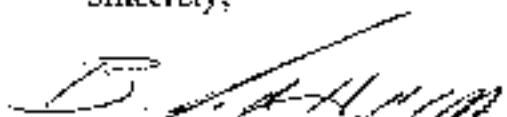
Gordon Smith for U. S. Senate - \$5,000.00 to the General Election

Ms. Neil Evans
April 15, 1996
Page - 2

The third item which relates to administrative expenses will be addressed in the upcoming FEC report. The committee does not incur much in the way of administrative expenses. Most services provided by inc are covered under the Treasurer function.

Should you have any questions, please feel free to contact me directly at 601/853-9944.

Sincerely,


B. Keith Hill, CPA

Treasurer

BKH/kh

enclosures: Copy - Notice dated March 27, 1996
Schedule A - 11C - Period 07/01/95 - 12/31/95
Schedule B - 23 - Period 07/01/95 - 12/31/95



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

RQ-2

MAR 27 1996

B. Keith Hill, Treasurer
Senate Victory Fund PAC (FKA
Cochran Committee)
P.O. Box 1331
Jackson, MS 39225

Identification Number: C00202861

Reference: Year End Report (7/1/95-12/31/95)

Dear Mr. Hill:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s).

Celebrating the Commission's 20th Anniversary

YESTERDAY, TODAY AND TOMORROW
DEDICATED TO KEEPING THE PUBLIC INFORMED

to the donor(s) in accordance with 11 CFR §103.3(b). In order to protect the donor's interests, the Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

-Schedule B of your report (pertinent portion(s) attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) precludes a multicandidate committee from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If you have made an excessive contribution, you should notify the recipient and request a refund of the amount in excess of \$5,000 and/or notify the recipient in writing of your redesignation of the contribution. In the best interest of your committee, all refunds and redesignations should be made within sixty days of the treasurer's receipt of the contribution(s).

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the contributor. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. 11 CFR §110.1(b)

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

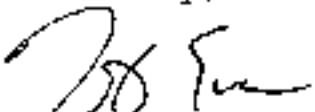
-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. §434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. §433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR §104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §§441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Neil Evans
Reports Analyst
Reports Analysis Division

SCHEDULE A

ITEMIZED RECEIPTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
American Maritime Officers PAC 650 Fourth Avenue Brooklyn, NY 11232 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE: 2,000.00	2,000.00
American Physical Therapy Cong. Act. Comm. 1111 North Fairfax Street Alexandria, VA 22314 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
ATLA PAC 1050 - 31st Street, NW Washington, DC 20007 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE: 5,000.00	5,000.00
Auction Markets PAC/Chicago Board of Trade 141 West Jackson Boulevard Chicago, IL 60604 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
Barnett People for Better Government 50 W. Laura Street Jacksonville, FL 32202 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
Bell South Services Federal PAC 101, 3700 Colonnade Parkway Birmingham, AL 35243 RECEIPT FOR: Primary	11/15/95 / N/A 11/14/95 / OCCUPATION: N/A AGGREGATE YEAR-TO-DATE: 3,000.00	3,000.00
Better Government Fund of McDermott 1525 Wilson Boulevard Suite 100 Arlington, VA 22209 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE: 1,000.00	1,000.00
SUBTOTAL of Receipts This Page		14,000.00

9/15/96 4:30 pm

11C w/ Paper English. Requerid FEC ID # 1)

BellSouth Telecommunications Inc. Federal PAC

1155 Peachtree St., NW #1918
Atlanta, GA 30309

FEC# C044P 99652

Allen G. Hobley, Treas

SCHEDULE A

ITEMIZED RECEIPTS

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NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
NEbr-Dak Farmers Cooperative PAC 7525 Red River Road Valparaiso, ND 58073 9698 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 9/29/95 1,000.00
FULL NAME AND MAILING ADDRESS: Mississippi Power Company Federal PAC Post Office Box 4079 Gulfport, MS 38501 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 10/27/95 1,000.00
FULL NAME AND MAILING ADDRESS: Mobil Corporation PAC 3225 Galloway Road Fairfax, VA 22037 0001 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 12/27/95 1,000.00
FULL NAME AND MAILING ADDRESS: Mutual of Omaha Companies PAC Mutual of Omaha Plaza Omaha, NE 68175 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 10/11/95 1,000.00
FULL NAME AND MAILING ADDRESS: 703/349-3007 MACOS PAC 1000 1/2 1st Street NW 413 North Lee Street 1000 1/2 1st Street NW Alexandria, VA 22314 RECEIPT FOR: Primary <i>PC# C 000 2226 8</i>	N/A <i>Not a Div of Chas Corp Share</i> OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 9/29/95 1,000.00
FULL NAME AND MAILING ADDRESS: National League of Postmasters PAC 1025 North Royal Street Alexandria, VA 22314 1569 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 12/12/95 1,000.00
FULL NAME AND MAILING ADDRESS: National Breiller Council PAC 1155 Fifteenth Street, NW Suite 614 Washington, DC 20005 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 9/29/95 2,000.00
SUBTOTAL of Receipts This Page		8,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of my political committee to solicit contributions from such committee.

NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE:	AMOUNT OF DISBURSEMENT:
Bob Dole for President 810 First Street, N.E. Suite 300 Washington, DC 20002	Campaign contribution DISBURSEMENT FOR: Primary	9/29/95	4,000.00
Gordon Smith for U. S. Senate 5285 SW Meadow Road Suite 181 Lake Oswego, OR 97035	PURPOSE OF DISBURSEMENT: Contrib - Primary Debt Ret. DISBURSEMENT FOR: Primary	12/15/95	1,000.00
Gordon Smith for U. S. Senate 5285 SW Meadow Road Suite 181 Lake Oswego, OR 97035	PURPOSE OF DISBURSEMENT: Contrib - General DISBURSEMENT FOR: Primary (Grand)	12/15/95	5,000.00
Reelect Thurmond Committee Post Office Box 11691 Columbia, SC 29211-1691	PURPOSE OF DISBURSEMENT: Campaign Contrib. - Primary DISBURSEMENT FOR: Primary	12/26/95	5,000.00
SUBTOTAL of Receipts This Page			15,000.00
TOTAL This Period			15,000.00

SCHEDULE A

ITEMIZED RECEIPTS

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NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
American Maritime Officers PAC 650 Fourth Avenue Brooklyn, NY 11232 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 9/13/95 1,000.00 3,000.00
American Physical Therapy Cong. Act. Comm. 1111 North Fairfax Street Alexandria, VA 22314 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 9/14/95 1,000.00 1,000.00
ATLA PAC 1060 - 31st Street, NW Washington, DC 20007 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 9/29/95 5,000.00 5,000.00
Auction Markets PAC/Chicago Board of Trade 141 West Jackson Boulevard Chicago, IL 60604 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 11/22/95 1,000.00 1,000.00
Barnett People for Better Government 80 W. Laura Street Jacksonville, FL 32202 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 9/29/95 1,000.00 1,000.00
BellSouth TeleCommunications Fed., PAC 1155 Peachtree St., #1920 Atlanta, GA 30309 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 11/16/95 3,000.00 3,000.00
Better Government Fund of McConnell 1525 Wilson Boulevard Suite 100 Arlington, VA 22209 RECEIPT FOR: Primary	N/A OCCUPATION: N/A AGGREGATE YEAR-TO-DATE:	DATE: 12/13/95 1,000.00 1,000.00
SUBTOTAL of Receipts This Page		24,000.00

Schedule A

ITEMIZED RECEIPTS

For Lines: 31c

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
Minn-Dak Farmers Cooperative PAC 7515 Red River Road Wahpeton, ND 58073 9688	N/A OCCUPATION: N/A	DATE: 9/29/95 1,000.00 AGGREGATE YEAR-TO-DATE: 1,000.00
RECEIPT FOR: Primary		
FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
Mississippi Power Company Federal PAC Post Office Box 4079 Gulfport, MS 39501	N/A OCCUPATION: N/A	DATE: 10/27/95 1,000.00 AGGREGATE YEAR-TO-DATE: 1,000.00
RECEIPT FOR: Primary		
FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
Mobil Corporation PAC 3225 Gallows Road Fairfax, VA 22037 0001	N/A OCCUPATION: N/A	DATE: 12/27/95 1,000.00 AGGREGATE YEAR-TO-DATE: 1,000.00
RECEIPT FOR: Primary		
FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
Mutual of Omaha Companies PAC Mutual of Omaha Plaza Omaha, NE 68175	N/A OCCUPATION: N/A	DATE: 10/11/95 1,000.00 AGGREGATE YEAR-TO-DATE: 1,000.00
RECEIPT FOR: Primary		
FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
Mat'l Assoc. of Chain Drug Stores 413 North Lee Street Alexandria, VA 22314	N/A OCCUPATION: N/A	DATE: 8/29/95 1,000.00 AGGREGATE YEAR-TO-DATE: 1,000.00
RECEIPT FOR: Primary		
FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
National League of Postmasters PAC 1035 North Royal Street Alexandria, VA 22314 1549	N/A OCCUPATION: N/A	DATE: 12/12/95 1,000.00 AGGREGATE YEAR-TO-DATE: 1,000.00
RECEIPT FOR: Primary		
FULL NAME AND MAILING ADDRESS:	NAME OF EMPLOYER:	AMOUNT OF RECEIPT:
National Broiler Council PAC 1155 Fifteenth Street, NW Suite 614 Washington, DC 20005	N/A OCCUPATION: N/A	DATE: 9/29/95 2,000.00 AGGREGATE YEAR-TO-DATE: 2,000.00
RECEIPT FOR: Primary		
SUBTOTAL of Receipts This Page		8,000.00

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NAME OF COMMITTEE: The Senate Victory Fund, PAC

FULL NAME AND MAILING ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE:	AMOUNT OF DISBURSEMENT:
Bob Dole for President 110 First Street, N.E. Suite 300 Washington, DC 20002	Campaign contribution DISBURSEMENT FOR: Primary	9/29/95	4,000.00
Gordon Smith for U. S. Senate 3285 SE Meadow Road Suite 161 Lake Oswego, OR 97035	Contrib - Primary Debt Ret. DISBURSEMENT FOR: Primary	12/16/95	1,000.00
Gordon Smith for U. S. Senate 3285 SE Meadow Road Suite 161 Lake Oswego, OR 97035	Contrib - General DISBURSEMENT FOR: General	12/15/95	5,000.00
Select Thurmond Committee Post Office Box 11691 Columbia, SC 29212-1691	Campaign Contrib. - Primary DISBURSEMENT FOR: Primary	12/16/95	5,000.00
SUBTOTAL of Receipts This Page			15,000.00
TOTAL This Period			15,000.00

Federal Election Commission
**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input type="checkbox"/>	Hand Delivered	DATE OF RECEIPT
<input checked="" type="checkbox"/>	First Class Mail	POSTMARKED <i>4-16-96</i>
<input type="checkbox"/>	Registered/Certified Mail	POSTMARKED
<input type="checkbox"/>	No Postmark	
<input type="checkbox"/>	Postmark Illegible	
<input type="checkbox"/>	Received from the House Office of Records and Registration	DATE OF RECEIPT
<input type="checkbox"/>	Received from the Senate Office of Public Records	DATE OF RECEIPT
<input type="checkbox"/>	Other (Specify): <i>JMH</i>	POSTMARKED and/or DATE OF RECEIPT
PREPARER		DATE PREPARED <i>4-22-96</i>